

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

PLANNED PARENTHOOD
FEDERATION OF AMERICA, INC., et al.,

Plaintiffs,

v.

CENTER FOR MEDICAL PROGRESS, et
al.,

Defendants.

Case No. [16-cv-00236-WHO](#)

**COURT PROPOSED LAW
ENFORCEMENT CONTACTS
STIPULATION**

The parties agree that David Daleiden made the following contacts with members of law enforcement and provided members of law enforcement with documents and recordings made by the Center for Medical Progress.

1. In approximately September 2014, David Daleiden provided information to the Maricopa County, Arizona District Attorney's Office regarding StemExpress, other tissue procurement organizations, and various non-Planned Parenthood abortion clinics.

2. On March 9, 2015, David Daleiden spoke on the phone with officials from the Oklahoma Attorney General's Office regarding non-Planned Parenthood organizations in Oklahoma.

3. On May 21 and 22, 2015, David Daleiden met with officials from the El Dorado County, California Sheriff's Office and the El Dorado County, California District Attorney's Office regarding StemExpress. Defendant Albin Rhomberg was also in attendance on May 21.

4. In approximately May 2015, David Daleiden gave other people information to provide to the Orange County, California District Attorney's Office regarding DaVinci Biosciences, DV Biologics, and various non-Planned Parenthood abortion clinics.

5. In May and June 2015, David Daleiden spoke with various members of Congress

1 and their staff to explain the results of CMP's investigation.

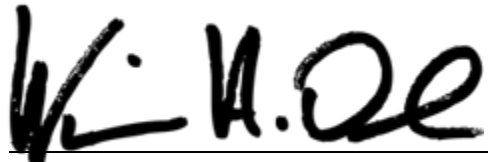
2 6. Prior to June 26, 2015, David Daleiden spoke with officials from the Maricopa
3 County, Arizona District Attorney's Office and Arizona Attorney General's Office regarding
4 StemExpress, other tissue procurement organizations, PPFA, various non-Planned Parenthood
5 abortion clinics, Tissue BioSource, and Advanced Tissue Services.

6 7. On June 26, 2015, David Daleiden spoke on the phone with officials from the
7 Michigan Attorney General's Office regarding StemExpress, Planned Parenthood Federation of
8 America, Planned Parenthood Mid-South Michigan, and Northland Family Planning.

9 8. On July 3, 2015, David Daleiden spoke on the phone with officials from the Texas
10 Attorney General's Office regarding StemExpress, Planned Parenthood Gulf Coast, Planned
11 Parenthood Center for Choice, and Planned Parenthood Federation of America.

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13 **IT IS SO ORDERED.**

14 Dated: October 21, 2019

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17 William H. Orrick
18 United States District Judge
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